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January 9, 2023

Via ECF

Honorable Marcia M. Henry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Ins. Company, et al. v. Stybel, et al.*
Case No. 1:22-cv-02834-PKC-MMH
RR File No.: 005100-03539

Dear Judge Henry:

We represent Plaintiffs (collectively “Plaintiffs” or “GEICO”) in the above-referenced matter. Pursuant to Your Honor’s Order dated December 14, 2022 (the “Order”), we write to provide the Court with a status update.

Romgo Tech Service, Inc. (“Romgo”) provided responsive documents to Plaintiffs’ subpoena on December 19, 2022. Plaintiffs have also met and conferred with Romgo’s attorney, Mestechkin Law Group PC, on scheduling the deposition of Romgo’s manager.

Seaview Services Inc. (“Seaview”) has not contacted Plaintiffs nor filed a letter to the Court’s docket as of the time of this filing. Pursuant to the Order, Plaintiffs served the required documents on all known means of contact for Seaview, including (i) the address listed on Seaview’s Certificate of Incorporation; and (ii) Trudi Winter of BlumbergExcelsior Corporate Services Inc., the incorporator of Seaview. Plaintiffs conducted an extensive public records search on Seaview and found no other forms of contact. To date, Seaview still has no phone number, website, or any indicia of a legitimate business, and its only known address is an apartment in Bell Harbor, New York.

Plaintiffs will advise the Court should we receive any response from Seaview by today’s deadline. However, if Seaview fails to respond to Plaintiffs’ December 6, 2022 motion to compel pursuant to the Order, Plaintiffs respectfully request the Court grant Plaintiffs’ motion to compel Seaview’s response to Plaintiffs’ subpoena *duces tecum* for the reasons outlined in Plaintiffs’ motion to compel. See ECF 25.

We thank the Court for its time and continuing attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Garin Scollan

Garin Scollan

Encl.

Cc: All counsel of record (*via* ECF)